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AAA Life Insurance Company*

**UNITED STATES DISTRICT COURT**

## **DISTRICT OF NEVADA**

BIANCA LANG-BLACK, an individual,

**Plaintiff,**

VS.

AAA LIFE INSURANCE COMPANY; a foreign corporation; and DOES I through V, and ROE CORPORATIONS I through V, inclusive,

## Defendants.

Case No. 2:23-cv-00117-GMN-DJA

**STIPULATION TO EXTEND  
DEADLINE FOR DEFENDANT TO  
FILE ITS REPLY BRIEF IN SUPPORT  
OF ITS MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

**(FIRST REQUEST)**

Plaintiff, Bianca Lang-Black, and Defendant, AAA Life Insurance Company (“AAA” or “Defendant”), by and through their respective counsel of record, hereby stipulate that:

1. Defendant filed its Motion for Partial Summary Judgment on the Pleadings as to Plaintiff's Second Cause of Action for Violation of Unfair Practices in Settling Claims Pursuant to Fed. R. Civ. P. 12(c) on March 7, 2023 (ECF No. 12).

2. Plaintiff filed her Response to Defendant's Motion for Partial Summary Judgment on the Pleadings as to Plaintiff's Second Cause of Action for Violation of Unfair Practices in Settling Claims Pursuant to Fed. R. Civ. P. 12(c) on March 21, 2023 (ECF No. 13).

3. That Defendant's Reply brief is presently due on March 28, 2023. However, due to scheduling difficulties with Defendant AAA's counsel, including multiple recent mediations (March 23, 2023; and today, March 27, 2023,) and depositions (March 31, 2023), coupled with

1 the need for client review of any submission, additional time is needed by Defendant AAA to  
2 file its reply brief. This request is not made for an improper purpose or to unnecessarily delay  
3 these proceedings. This is the first request for an extension of the deadline for Defendant AAA  
4 to file its Reply brief.

5 4. The parties agree that Defendant shall have until April 4, 2023, to file its Reply  
6 Brief.

7 IT IS SO STIPULATED.

9 Dated: March 27, 2023

10 HALL JAFFE & CLAYTON, LLP

11 /s/ *Riley A. Clayton*

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Dated: March 27, 2023

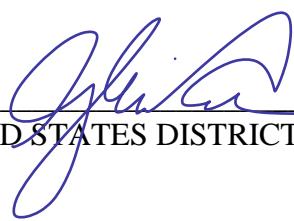
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/s/ *Caitlin J. Lorelli*

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19 **O R D E R**

20 IT IS SO ORDERED.

22   
23 \_\_\_\_\_  
24 UNITED STATES DISTRICT COURT JUDGE  
25

26 Dated: March 27, 2023